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RELX Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

AMERICAN EVENTS, INC., an Oregon
corporation d/b/a The Materials Show, ,

Case No.

Plaintiff,

v.

**DEFENDANT RELX INC.'S NOTICE OF
REMOVAL**

RELX, INC., a Delaware corporation d/b/a
REED EXHIBITIONS and RX; RX
GLOBAL, INC., a Delaware corporation;
PERFORMANCE DAYS; STEPHEN
McCULLOUGH, and individual; and JOHN
JOSEF, and individual,

Defendant.

Page 1 - Defendant RELX Inc.'s Notice of Removal

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON, PORTLAND DIVISION

PLEASE TAKE NOTICE that Defendant Reed Exhibitions a division of RELX Inc. ("RELX") (sued incorrectly herein as "RELX, Inc. d/b/a Reed Exhibitions and RX"), by its attorneys, Miller Nash LLP, hereby removes the above-entitled action, originally filed in the Circuit Court of the State of Oregon for the County of Multnomah, to the United States District Court for the District of Oregon, pursuant to 28 U.S.C. §§ 1441 and 1446 and 28 U.S.C. § 1332.

1. Plaintiff American Events, Inc. has commenced an action against the Defendants in the Circuit Court of the State of Oregon for the County of Multnomah, Case No. 22-cv-34842. Pursuant to 28 U.S.C. §1446(a), a true and correct copy of pleadings served in this case, including Plaintiff's Complaint and Amended Complaint, is annexed hereto as **Exhibit 1**.

2. RELX has not answered, moved, or otherwise responded to the Amended Complaint, and its deadline to do so has not expired.

3. Upon information and belief, no other Defendant has answered, moved, or otherwise responded to the Amended Complaint, and their deadline to do so has not expired.

4. Pursuant to 28 U.S.C. § 1332, this Court has jurisdiction over this action because the dispute involves citizens of different states and the amount in controversy exceeds \$75,000.

5. Plaintiff American Events, Inc., is a corporation organized and existing pursuant to the laws of the State of Oregon, with its principal place of business located in the State of Oregon. **Ex. 1** at p. 25, ¶ 2.

6. Defendant RELX is a corporation organized and existing pursuant to the laws of the State of Delaware, with its principal place of business located in in New York.

Page 2 - Defendant RELX Inc.'s Notice of Removal

7. Defendant Stephen McCullough, an employee of RELX, resides within the State of Connecticut and consents to this removal. *See* Stephen McCullough's consent to removal, annexed hereto as **Exhibit 2**.

8. Defendant John Josef, an employee of RELX, resides within the State of Connecticut and consents to this removal. *See* John Josef's consent to removal, annexed hereto as **Exhibit 3**.

9. Upon information and belief, Defendant "Performance Days" is not a legal entity, but rather a trade name utilized by non-party Design & Development GmbH Textile Consult, a foreign corporation organized and existing pursuant to the laws of the nation of Germany and with its principal place of business located in Ismaning, Bavaria, Germany.

10. Upon information and belief, Defendant "Performance Days" has not been served, and therefore its consent to this removal is not required.

11. Upon information and belief, RX Global, Inc. was organized and existing pursuant to the laws of Delaware, but has been inactive for over 20 years, does not have a principal place of business in Oregon, and has no connection to this litigation or any named defendant.

12. Upon information and belief, Defendant RX Global Inc. has not been served, and therefore its consent to this removal is not required.

13. Plaintiff's Amended Complaint in this action seeks, in addition to other damages, monetary damages in an amount of no less than \$5,500,000.00. **Ex. 1**.

14. RELX's counsel accepted service on its behalf on October 25, 2022.

15. This Notice of Removal timely, as it is being filed within thirty (30) days of the receipt of the Complaint by RELX as required by 28 U.S.C. § 1446(b).

16. Venue is proper pursuant to 28 U.S.C. § 1441 because the removed action has been pending in this District.

17. RELX will promptly file a copy of this Notice of Removal with the Clerk of the Circuit Court of the State of Oregon for the County of Multnomah.

WHEREFORE, Defendant RELX Inc. removes the above-entitled action now pending in the Circuit Court of Multnomah County, State of Oregon, to the United States District Court for the District of Oregon, Portland Division.

DATED this 27th day of October, 2022.

MILLER NASH LLP

s/ Justin C. Sawyer

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